3M Sustainability &
Product Stewardship

3M Center, Building 220-06-E03
St. Paul, MN 55144-1000

TSCA Confidential Business Information Center (7407M)
WJC East; Room 6428; Attn: Section 8(e)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

November 19, 2019

NO CBI

Re: TSCA 8(e) Substantial Risk Notice: Sulfonate-based and Carboxylic-based Fluorochemicals, Docket 8EHQ-0598-373 - Results from Analysis of Surface Water Samples in the Decatur, Alabama Area

To whom it may concern:

3M is submitting this notice to supplement its previous submissions on sulfonate and carboxylic-based fluorochemicals. One enclosed analytical report includes data on 13 sulfonate and carboxylic-based fluorochemicals in surface water samples collected near the river inlet to the 3M Decatur production facility in Alabama (see Figure 1 below).

Figure 1: Sampling Location

While 3M does not believe that these data taken alone or cumulatively meet the "substantial risk" reporting threshold, we nevertheless recognize the ongoing work by U.S. EPA to assess fluorochemical exposure pathways. Therefore, we are placing these results in the 8(e) docket as a supplement to previous submissions.

If you have any questions or would like any additional information, please contact the 3M TSCA 8(e) Program Manager at tsca8eprogram@mmm.com.

Sincerely,

3M TSCA 8(e) Program Manager

Summary Report

Analysis of Decatur River Inlet Water Samples

Laboratory Request Number: E19-0735

Report Date – Date of Last Signature

Testing Laboratory

3M Environment, Health, Safety & Medical
3M EHS Laboratory
Building 260-5N-17
Maplewood, MN 55144-1000

Requester

Jon Gerber
3M Regulatory Affairs
3M Center, Bldg 220-6E-03
(651) 733-0226

ACCREDITED
Testing Cert. # 2052.01

The testing reported herein meet the requirements of ISO/IEC 17025:2017 "General Requirements for the Competence of Testing and Calibration Laboratories", in accordance with the A2LA Testing Certificate # 2052.01. Additionally, the laboratory's quality system has been audited and was determined to be in conformance with the EPA GLPs (40 CFR 792) by an independent A2LA assessment.

3M EHS Laboratory

3M EHS Laboratory Management: Brian T. Mader, Ph.D.

Summary Report

Analysis of Decatur River Water Inlet Samples

Report Date: Date of Last Signature

1 Introduction/Summary

The 3M EHS Laboratory received and analyzed water samples taken from several locations at the 3M Decatur facility. Samples were collected between September 12 - 14, 2019 and received at the 3M EHS Laboratory on September 19, 2019. One location was identified as 'Inlet from river' this location is used as a source of water to the facility and consists of water from the Tennessee River. Samples were analyzed under 3M EHS Laboratory project number E19-0569 for the list of target analytes included in **Table 1**. The concentration of the target analytes in samples collected at this location is included in **Table 2**.. Details regarding the analytical method used for the preparation and analysis of the samples, including quality control samples prepared and analyzed with the samples reported, can be found in 3M EHS Laboratory report 'E19-0569 Final Report'.

Table 1. Target Analytes

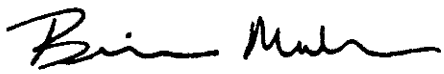
Target Analyte	Acronym	CAS No.
Perfluorobutane sulfonate	PFBS	29420-49-3 (K salt) 375-73-5 (acid)
Perfluorobutane sulfonamide	FBSA	30334-69-1
Nonafluoro-N,N-bis(2-hydroxyethyl)butane-1-sulfonamide	FBSEE Diol	34455-00-0
Nonafluoro-N-(2-hydroxyethyl)butane-1-sulfonamide	FBSE	34454-99-4
N-Methyl-Perfluorobutane Sulfonamide	MeFBSA	68298-12-4
N-(2-Hydroxyethyl)-N-Methyl-Perfluorobutane Sulfonamide	MeFBSE	34454-97-2
Perfluorobutanesulfinic acid	PFBSi	34642-43-8
Perfluorobutyl sulfonamide glycine acid	FBSAA	1910057-70-3
Perfluorobutyl-methyl sulfonamide glycine acid	MeFBSAA	159381-10-9
[(Nonafluorobutane-1-sulfonyl)-carboxymethylamino] acetic acid	FBSEE diacid or FBSEE-DA	1268835-43-3
2-Propenoic Acid, 2-[Methyl[(Nonafluorobutyl)Sulfonyl]Amino]Ethyl Ester	MeFBSEA	67584-SS-8
N-[3-(dimethylamino)propyl]-nonafluorobutanesulfonamide	PBSF/DMAPA	68555-77-1
3-((N-(3-(dimethylamino)propyl)-perfluorobutyl)sulfonamido)propanoic acid	PBSF/DMAPA/AA	172616-04-5

Table 2. Sample Results Summary

Sample Description	Sampling Date and Time	PFBS Concentration (ng/mL)	PFBSI Concentration (ng/mL)	FBSA Concentration (ng/mL)	MeFBSA Concentration (ng/mL)	FBSE Concentration (ng/mL)	MeFBSE Concentration (ng/mL)	FBSEE Diol Concentration (ng/mL)	FBSEE-DA Concentration (ng/mL)
Inlet from river-1	9/12/2019 6:45	1.85	1.30	<0.100	<0.100	<0.102	<0.250	<0.100	<0.100
Inlet from river-2	9/12/2019 14:40	<0.110	<0.0814	0.462	0.643	<0.102	<0.250	<0.100	<0.100
Inlet from river-3	9/12/2019 22:37	0.364	0.221	<0.100	<0.100	<0.102	<0.250	<0.100	<0.100
Inlet from river-4	9/13/2019 6:50	<0.110	<0.0814	<0.100	<0.100	<0.102	<0.250	<0.100	<0.100
Inlet from river-5	9/13/2019 14:40	<0.110	<0.0814	0.212	0.302	<0.102	<0.250	<0.100	<0.100
Inlet from river-6	9/13/2019 22:20	<0.110	<0.0814	<0.100	<0.100	<0.102	<0.250	<0.100	<0.100
Inlet from river-7	9/14/2019 6:35	0.228	0.141	<0.100	<0.100	<0.102	<0.250	<0.100	<0.100
Inlet from river-8	9/14/2019 14:17	<0.110	<0.0814	<0.100	<0.100	<0.102	<0.250	<0.100	<0.100

Sample Description	Sampling Date and Time	FBSAA (ng/mL)	MeFBSAA (ng/mL)	PBSF/DMAPA (ng/mL)	PBSF/DMAPA/AA (ng/mL)	MeFBSEA (ng/mL)
Inlet from river-1	9/12/2019 6:45	0.502	0.460	<0.253	0.105	<1.00
Inlet from river-2	9/12/2019 14:40	<0.500	0.329	<0.253	<0.100	<1.00
Inlet from river-3	9/12/2019 22:37	<0.500	0.178	<0.253	<0.100	<1.00
Inlet from river-4	9/13/2019 6:50	<0.500	<0.100	<0.253	<0.100	<1.00
Inlet from river-5	9/13/2019 14:40	<0.500	0.125	<0.253	<0.100	<1.00
Inlet from river-6	9/13/2019 22:20	<0.500	<0.100	<0.253	<0.100	<1.00
Inlet from river-7	9/14/2019 6:35	<0.500	<0.100	<0.253	<0.100	<1.00
Inlet from river-8	9/14/2019 14:17	<0.500	<0.100	<0.253	<0.100	<1.00

2 Signature



Digitally signed by Brian T. Mader
DN: c=US, st=MN, l=St. Paul, o=3M, ou=EHS Laboratory, cn=Brian T. Mader, email=bmader@mmm.com
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Brian T. Mader, Ph.D., 3M EHS Laboratory Management

3M

Package 1 of 1

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